

Important pillars of the EU climate policy are the RED, the Energy Efficiency Directive (EED), and the EU Emissions Trading Scheme (ETS). The RED sets the standards for the share of renewable energy to be used in the energy mix, and the EED sets targets to reduce energy consumption. The ETS sets a cap on the total amount of greenhouse gases that can be emitted and puts a price on emission allowances, which incentivises emission reductions and promotes investment in innovative, low-carbon technologies. These three pillars are crucial in reaching climate neutrality in the EU. However, they do not cover or incentivise to change the feedstock of the chemical sector. They only cover direct and energy-related emissions. In order for the chemical industry to defossilise we need policy instruments that focus on indirect emissions in the value chain. Stimulation is needed to create a level playing field vis-à-vis the energy and fuels sectors, and to create a momentum towards defossilisation of the chemical sector. Moreover, carbon is stored for longer periods of time when applied in chemicals and materials, especially when the chemicals and materials are recycled at the end of life.

As of yet, no instruments exist to stimulate the replacement of fossil carbon in chemicals and materials. Current policy proposals³ promote the transition to a circular and climate-neutral economy by prescribing, among other requirements, minimum levels of recycled content in packaging and other products. These proposals focus on a select number of products, and create a pull through the value chain. However, this is not enough. New instruments focusing on the input (or feedstock) need to be introduced in order to enhance the transitions to a circular and climate-neutral economy for a broader range of products. These instruments should go beyond existing policy proposals, by including biobased and CO₂-based content (in addition to recycled content). Sustainable biomass and CO₂ are crucial resources for chemical feedstock in a circular and climate-neutral chemical industry. Furthermore, additional options need to be introduced to support the switch to sustainable carbon. The Climate, Energy and Environmental Aid Guidelines need to be broadened for this purpose, and the General Block Exemption Regulation needs to introduce a category for sustainable carbon.

Neither climate nor circular economy policy in the EU offers enough incentives to promote the use of sustainable carbon as a feedstock for chemicals and materials in the chemical sector. Meanwhile, shifting from fossil carbon to sustainable carbon in the chemical sector is crucial for reaching climate neutrality, reducing pollution, protecting biodiversity, and reducing our unwanted dependencies on fossil fuels. A mix of instruments that promotes the use of sustainable carbon – through pricing, standard-setting and subsidising – is necessary to reach a climate-neutral and circular chemical sector. By ensuring that these instruments are coherent, and as integrated as possible, market distortions on the different use-forms of sustainable carbon are also minimised. EU-wide instruments ensure higher effectiveness of such instruments, and preserve a level playing field for the industry.

To stimulate the uptake of sustainable carbon in the chemical sector a range of instruments and approaches could be considered, for example...

- ... more focus of the European Commission on sustainable carbon;
- ... an Industrial Sustainable Carbon Regulation which sets targets for a minimum share of sustainable carbon used in the chemical sector;
- ... a border adjustment mechanism for sustainable carbon;
- ... more possibilities to subsidise the shift to sustainable carbon in chemicals and materials in the General Block Exemption Regulation;
- ... an IPCEI for sustainable carbon as a feedstock for the chemical sector.

³ such as the Packaging and Packaging Waste Regulation and the Ecodesign for Sustainable Product Regulation